

CAR Correlation Table - Storage Vessels
(40 CFR Part 60, Subpart Ka - 60.110a through 60.115)

Citations Part 60, Subpart Ka (Storage Vessels)	Citations, Part 65 ^{a,b}	Description	Type of Change ^c	Comments
60.110a	[Referencing Subpart]	Applicability and designation of affected facilities	R	The CAR does not include any provisions pertaining to applicability of referencing subparts. However, these provisions remain applicable to sources complying with the CAR.
60.111a	65.2 and [Referencing Subpart]	Definitions	R,S	All CAR definitions are in the CAR general provisions. Terms not used in the CAR and terms used only for applicability provisions are not defined in the CAR. See definitions correlation table.
60.112a(a)	[Referencing Subpart]	Standard: design capacity and true vapor pressure criteria	R	The applicability criteria for storage vessels required to be controlled are in the referencing subparts. These provisions remain applicable to sources complying with the CAR.
	65.42(b)	Compliance options for applicable storage vessels storing liquid with a vapor pressure <76.6kPa	BR	The CAR allows an additional compliance option for routing to a fuel gas system or process [65.42(b)(6)]. The CAR also provides clarification for those cases where an EFR is converted to an IFR [65.42(b)(3)].
60.112a(a)(1)	65.42(b)(2)	Comply by using an EFR	N	
	65.2	EFR design: pontoon-type or double-deck-type floating roof	S	The language defining what is meant by "external floating roof" is consolidated and contained in the definitions section of the general provisions.
	65.44(a)(2)	EFR design: closure device	N	
	65.44(a)(2)(i)	EFR design: two seals	N	

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60.112a(a)(1)	65.44(a)(1) 65.44(b)(1) 65.44(b)(2)	EFR design: roof shall be designed to float EFR operation: roof shall be floating at all times EFR operation: filling or refilling shall be continuous	BR	Subpart Ka requires the owner or operator to empty the tank once the roof rests on the leg supports and requires the emptying to be continuous and to be performed as soon as possible. This requirement reduced the amount of available storage space as facilities may not have the capacity or ability to place liquids in other vessels. One industry representative stated that they had to lease a barge on occasion for extra storage capacity when this situation arose. Upon review, the EPA determined that the intent of the provision is to avoid the emissions associated with raising and lowering the level of the liquid surface while the roof is resting on the support legs. The revised provisions in the CAR allow the surface level to be below the leg supports, but the liquid can only be drawn out of the tank in such a case. When the tank is to be filled, the process of filling must be continuous until the roof has risen off of the leg supports. In addition, the CAR specifies through language like, "fill...as soon as practical," that the owner or operator must try to avoid this type of situation.
60.112a(a)(1)(i)	65.44(a)(2)(ii)	EFR design: primary seal shall be a metallic shoe, liquid-mounted, or vapor-mounted	BI	Subpart Ka allows vapor mounted primary seals; the CAR does not, but does allow either a metallic shoe seal or a liquid-mounted seal.
60.112a(a)(1)(i)(A)	65.44(c)(7) and (d)(1)	EFR design: primary seal gap area for metallic shoe seal or liquid-mounted seal	C	<ul style="list-style-type: none"> - Subpart Ka sets out the primary seal gap allowances as part of the design standard. The CAR consolidates the allowance as part of the EFR inspection requirements. - The CAR specifies how to calculate the accumulated area of gaps. - The CAR specifically states that failures must be reported. Subpart Ka just states that a failure shall not exist.
60.112a(a)(1)(i)(B)	[Not Consolidated]	EFR inspection: primary seal gap area for vapor-mounted seal	BI	This paragraph pertains to primary seal gap area inspection on vapor mounted seals, the CAR does not allow vapor-mounted seals, therefore, this provision was not consolidated.
60.112a(a)(1)(i)(C)	65.44(a)(3)(x)	EFR design: metallic shoe seal must penetrate the surface and rise 61 cm above the surface	N	CAR language clarifies that this design requirement applies only to mechanical shoe seals used as primary seals.

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60.112a(a)(1)(i)(D)	65.44(a)(3)(xii)	EFR design: initial inspection for holes, tears, or other openings in primary seal	N	
	65.44(c)(10) and (d)(2)	EFR inspection and repair: inspection for and repair of holes, tears, or other openings in primary seal	C	Subpart Ka does not specifically state that EFRs must be inspected only that a failure can not exist.
	65.2	EFR: holes or tears in the primary seal	N	The CAR defines "Failure, EFR." Significant consolidation of text is gained by using one term to mean the various failures that can happen to an EFR.
60.112a(a)(1)(ii)	[Not Consolidated]	Secondary seal to meet the following requirements	NC	Introductory paragraph is not needed in CAR structure.
60.112a(a)(1)(ii)(A)	65.44(a)(3)(xi)	EFR design: secondary seal must completely cover the space between the roof edge and the vessel wall	N	

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60.112a(a)(1)(ii)(B)	65.44(c)(8)	EFR inspection: secondary seal gap measurement procedures metallic shoe and liquid mounted	C	<ul style="list-style-type: none"> - The CAR specifies how to calculate the accumulated area of gaps. - The CAR specifically states that failures must be repaired. Subpart Ka just states that a failure shall not exist. - Subpart Ka sets out the secondary seal gap allowances as part of the design standard. The CAR consolidates the allowance as part of the EFR inspection requirements.
	[Not Consolidated]	EFR inspection: secondary seal gap measurement procedures - vapor mounted	BI	There is no language for vapor-mounted seals in the CAR because they are not allowed.
60.112a(a)(1)(ii)(C)	65.44(a)(3)(xii)	EFR design: initial inspection for holes, tears, or other openings in secondary seal	N	
	65.44(c)(10) and (d)(2)	EFR inspection and repair: inspection for and repair of holes, tears, or other openings in secondary seal	C	Subpart Ka does not specifically state that EFRs must be inspected, only that a failure can not exist.
60.112a(a)(1)(ii)(C)	65.2	EFR: holes or tears in the secondary seal	N	The CAR defines "Failure, EFR." Significant consolidation of text is gained by using one term to mean the various failures that can happen to an EFR.
60.112a(a)(1)(ii)(D)	65.44(b)(9) and 65.44(c)(8)	EFR inspection and repair: secondary seal criteria exemption when inspecting the primary seal	N	

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Citations Part 60, Subpart Ka (Storage Vessels)	Citations, Part 65^{a,b}	Description	Type of Change^c	Comments
60.112a(a)(1)(iii)	65.44(a)(3)(i)	EFR design: openings must project below the liquid surface	N	
	65.44(a)(3)(ii), (a)(3)(iii), and (a)(3)(ix)	EFR design: openings must have covers	BI	<ul style="list-style-type: none"> - Openings in the EFR must be covered; CAR makes exception for “roof drains” while Ka does not; CAR requires that covers be gasketed. - The CAR specifies that covers on access hatches and guage floats be bolted or fastened when they are closed.
	65.44(b)(3), (b)(4), and (b)(8)	EFR operation: covers on openings must be kept closed	BI	<ul style="list-style-type: none"> - Roof drains are included in the exemption list in the CAR. - The CAR specifies that covers on access hatches and guage floats be bolted or fastened when they are closed.
	65.44(a)(3)(iv) and (b)(5)	EFR operation: automatic bleeder vents to be kept closed	N	
	65.44(a)(3)(iv) and (b)(6)	EFR operation: rim space vents to be set open	N	
60.112a(a)(1)(iv)	65.44(a)(3)(v)	EFR design: roof drains must have slotted membrane fabric covers	N	The CAR provision is that each roof drain shall have the fabric cover, not just emergency roof drains.
60.112a(a)(2)	65.42(b)(1)	Comply by using an IFR	N	
	65.43(a)(2)	IFR design: continuous closure device requirement	C	Subpart Ka said only to use a continuous closure device. The CAR follows the other storage vessel rules which specify liquid-mounted, metallic shoe, or two continuous seals.

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60.112a(a)(2)	65.43(a)(1)	IFR design: roof shall be designed to float	C	Subpart Ka requires the owner or operator to empty the tank once the roof rests on the leg supports and requires emptying to be continuous and to be performed as soon as possible. This requirement reduced the amount of available storage space as facilities may not always have the capacity or ability to place liquids in other vessels. One industry representative stated that they had to lease a barge on occasion for extra storage capacity when this situation arose. Upon review, the EPA determined that the intent of the provision is to avoid emissions associated with raising and lowering the level of the liquid surface while the roof is resting on the support legs. The revised provisions in the CAR allow the surface level to be below the leg supports, but the liquid can only be drawn out of the tank in such a case. When the tank is to be filled, the process of filling must be continuous until the roof has risen off of the leg supports. In addition, the CAR specifies, through language like, "fill...as soon as practical," that the owner or operator must try to avoid this type of situation.
	65.43(b)(1)	IFR operation: roof shall be floating at all times		
	65.43(b)(2)	IFR operation: filling or refilling		
	65.43(a)(4)(i)	IFR design: each opening must project below the liquid surface	C	<ul style="list-style-type: none"> - The CAR clarifies that the openings must project below the "stored liquid surface." - The CAR uses the language "noncontact internal floating roof" where subpart Ka uses the term "cover."
	65.43(a)(4)(ii), (a)(4)(iv), and (a)(4)(vii)	IFR design: openings must have covers	BI	<ul style="list-style-type: none"> - The CAR also requires that all opening covers are gasketed and that access hatches and gauge float wells be bolted closed. - The CAR adds column wells, ladder wells, and sample wells to the exception list and includes a provision that covers must be gasketed, and automatic bleeder vents and rim space vents be gasketed.

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60.112a(a)(2)	65.43(b)(4)	IFR operation: covers must be kept closed	N	
	65.43(b)(3)	IFR operation: automatic bleeder vents kept closed	BI	<ul style="list-style-type: none"> - The CAR requires that the automatic bleeder vent be equipped with a gasket. - The CAR uses the language "roof" where subpart Ka uses the term "cover." This change was made to clear up confusion about what a "cover" is under the storage vessel provisions. For clarity, the CAR adds language specifying that the covers must be "set" closed.
60.112a(a)(2)	65.43(b)(4)	IFR operation: rim vents set to open	BI	<ul style="list-style-type: none"> - The CAR requires that the rim vent be gasketed. - Subpart Ka requires the rim space vents to open when the roof floats off the leg supports. The CAR requires rim space vents to open only when the roof is not floating; this is a clarification of the meaning of this requirement.
60.112a(a)(3)	65.42(b)(4) and (b)(5)	Comply by using a CVS/CD	N	"Closed-vent system" language is used for consistency in the CAR in place of subpart Ka's "vapor recovery system".
	65.42(b)(6)	Vapor return requirement	N	CAR uses language regarding routing to a process or to a fuel gas system in place of subpart Ka language which calls for a vapor return or disposal system.
	65.42(b)(5)(i)	Reduce emissions by 95% or greater	N	
	65.143(a)(1)	Vapor recovery system to collect all VOC vapors	C	The CAR specifies that CVS will collect "the" vapors instead of specifying that "all" vapors be collected.
	65.42(b)(4)	CVS/CD design: flare option	BR	Subpart Ka does not specify flares, but flares can be used to achieve 95% reduction. CAR does not require 95% reduction for flares but does require compliance with flare provision.
60.112a(a)(4)	65.42(b)(7)	Equivalent system for control	N	
60.112a(b)	65.42(c)	Compliance options for applicable storage vessels storing liquid with a vapors pressure ≥ 76.6 kPa	BR	The CAR allows an additional compliance option for routing to a fuel gas system or process.

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Citations Part 60, Subpart Ka (Storage Vessels)	Citations, Part 65^{a,b}	Description	Type of Change^c	Comments
60.113a(a)	65.3(b)(3)	Compliance with the standard	N	The CAR makes a general statement of what compliance will be based on "monitoring results, review of operation and maintenance procedures... review of operation and maintenance records, inspection of the regulated source..." Subpart Ka just references the testing and procedure paragraphs of the subpart. However, these provisions are in the part 60 General Provisions and therefore apply to subpart Ka sources.
60.113a(a)(1)	65.44(c)	EFR compliance determination procedures	N	
60.113a(a)(1)(i)	65.44(c)(1) and (c)(2)	EFR inspection: gap measurements	N	
60.113a(a)(1)(i)(A)	65.44(c)(1)	EFR inspection: frequency for primary seal gap measurements	BR	Subpart Ka requires the measurements to be performed within 60 days of the initial fill. The CAR requires the measurement to be performed during hydrostatic testing or within 90 days of initial fill.
	65.44(c)(4)	Inspections that dislodge seal must be done as rapidly as possible	N	
60.113a(a)(1)(i)(B)	65.44(c)(2)	EFR inspection: frequency for secondary seal gap measurements	BR	Subpart Ka requires testing within 60 days of initial fill. The CAR extends the time period to 90 days, and provides an alternative (by the compliance date of subpart Ka, whichever occurs last).
60.113a(a)(1)(i)(C)	65.44(c)(3)	EFR inspection: re-introduction of petroleum liquid	BR	As a burden reduction, the CAR language allows 90 days for this inspection rather than 60 days as subpart Ka does.
60.113a(a)(1)(i)(D)	65.47(c)(2)	Recordkeeping: seal gap measurement results (any measurement)	N	

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60.113a(a)(1)(i)(D)	65.4(a)	Recordkeeping: seal gap measurement results (retention)	C	Subpart Ka requires record to be kept for 2 years. In the CAR, the records for subpart Ka tanks that are not subject to Title V are still required to be kept for 2 years. Title V tanks subject to subpart Ka must keep the records for 5 years. The CAR further differentiates between records that shall be kept for measurements that conform to standards and records for measurements not conforming to standards. (See general provisions.)
60.113a(a)(1)(i)(E)	65.48(b)(2)	Reporting: seal gaps that do not meet the specifications	BR	<ul style="list-style-type: none"> - Subpart Ka requires a report identifying the vessels, listing all reasons why the specifications were not met, and describing the actions taken. The CAR wording is somewhat different. The CAR requires a report of the measurement date, the calculation results, and a notation of the measurements that did not conform to the specifications. - The CAR does not require the action description for this report, and allows this report to be filed with the next periodic report (subpart Ka requires this report within 60 days).
60.113a(a)(1)(ii)	65.44(c)(6)	Gap width measurement procedures	N	
60.113a(a)(1)(iii)	65.44(c)(7) - (c)(8)	Gap surface area ratio compared to standard	N	
60.113a(a)(1)(iv)	65.44(c)(5) 65.48(c)(2)	Seal gap measurement notification (requirement)	N	

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60.113a(a)(2)	65.145(b), 65.165(b)(1)-(b)(3)	CVS storage vessels pre-construction report requirement	BR	<ul style="list-style-type: none"> - Subpart Ka requires that information be provided such as emission test data for a similar storage tank and control device, and manufacturers specifications and estimated emission reduction capacity. This information is to aid the Administrator in evaluating the effectiveness of the control system. The CAR requires a "design evaluation" which is similar in that it provides information on the control effectiveness of the system. The CAR gives a list of devices where only a small amount of information is required. - Subpart Ka requires this information to be submitted on or before commencement of construction. The CAR requires the design evaluation submitted with the Initial Compliance Status Report which is 240 days after the compliance date. - The CAR also requires a monitoring plan to be included in the design evaluation specifying the parameters that must be monitored. - The CAR allows a facility to perform a performance test or a design evaluation on a storage vessel control device. The CAR also provides a list of several control devices where neither a performance test nor design evaluation is required [65.145(b)(2)].
60.114a(a)	65.8(a)	Administrator will publish alternative means of emission limitation in the Federal Register	N	
60.114a(b)	65.8(a)(2)	Public notice and alternative means of emission limitation	N	
60.114a(c)	65.8(b)(3) and 65.46	Alternative means of emission limitation: written application procedures and contents	N	
60.114a(d)	65.8(a)(1)	Alternative means of emission limitation: Administrator may condition the permission	N	

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60.114a(e)	[Not Consolidated]	Alternative means of emission limitation: approval of volume-maximizing seal as equivalent to vapor-mounted seal	NC	The CAR does not allow vapor mounted seals and does not allow this alternative to vapor mounted seals.
60.115a(a)	[Referencing Subpart]	Recordkeeping: petroleum liquid stored, period of storage, maximum TVP	R	The CAR does not include this applicability record.
60.115a(b)	[Referencing Subpart]	Recordkeeping: Reid vapor pressure and maximum storage temperature	R	The CAR does not contain procedures on determining the vapor pressure. These are in the referencing subpart.
60.115a(c)	[Referencing Subpart]	Recordkeeping: TVP for crude oil, procedures	R	The CAR does not contain procedures on determining the vapor pressure. These are in the referencing subpart.
60.115a(d)	[Referencing Subpart]	Recordkeeping: recordkeeping exemptions for subpart Ka	R	This exemption is not included in the CAR because it exempts sources from the provision of §60.115a and none of the provisions of this section are included in the CAR.
New	65.42(b)(3), and 65.45	EFR converted to an IFR	C	The CAR clarifies what provisions to follow when an EFR has been converted to an IFR and is being used to comply.
New	65.42(b)(4), (b)(5)(iii), (b)(5)(iv), 65.163(b)(2), and 65.166(d)	Planned routine maintenance	BR	The CAR allows up to 240 hours per year for routine maintenance during which the control device does not have to meet the specification.
New	65.42(b)(6), 65.144, 65.163(b)(3), and 65.165(a)	Allowance for routing to the fuel gas system or process as a control option	BR	The CAR allows storage vessel vent streams to be routed to a fuel gas system or to the process as compliance options.
New	65.43(a)(4)(iii), (a)(4)(v), and (a)(4)(vi)	Penetrations of the IFR	BI	The CAR has additional fitting requirements for various penetrations in the floating roof including penetrations for sample wells, ladders, and roof supports.
New	65.43(c) and (d)	IFR inspection and repair requirements	BI	The CAR specifies inspection and repair requirements for IFRs. Subpart Ka has no inspection and repair requirements for IFRs.

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New	65.44(a)(3)(vi)- (a)(3)(viii), and 65.44(b)(7)	Guide pole requirements	BI	The CAR includes fitting requirements for guide poles.
New	65.44(c)(9), 65.47(d)(2), and 65.48(b)(3)	Unsafe to perform seal gap measurement	BR	The CAR clarifies what to do when it is unsafe to perform seal gap measurements or to inspect a vessel. It allows an extension for the seal gap measurement or the inspection for as much as 105 days.
New	65.47	Storage vessel records	BI	Subpart Ka does not contain any of the following records that are required by the CAR: vessel dimensions and capacity, inspection results, emptying and repairing extensions, and resting on leg records. The only record subpart Ka requires is for seal gap measurements which is also in the CAR [65.47(c)(2)].
New	65.48	Storage vessel reports	BI	Subpart Ka does not contain any of the following reports that are required by the CAR: inspection results, extension documentation, refilling notification, or compliance certification. The only reports contained in subpart Ka pertain to seal gap measurements which are also in the CAR [65.48(b)(2) and (c)(2)].
New	65.143(a)(2) and 65.147(a)(1)	CVS and control device must be operating when emissions are vented to them	C	The CAR clarifies that the CVS and control devices must be in operation when emissions are vented to them.
New	65.143(a)(3), 65.163(a)(1), and 65.166(b)(2) and (b)(3)	Bypass monitoring	BI	The CAR requires bypass monitoring.
New	65.143(b), (c), and (d) 65.163(a) and 65.166(b)(1)	CVS inspection requirements	BI	Subpart Ka does not have the inspection and repair or recordkeeping requirements for closed-vent systems that the CAR does.
New	65.145(a) and (c)	Storage vessel nonflare control device monitoring requirements	BI	Subpart Ka does not contain monitoring requirements for control devices used to control emissions from storage vessels.

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New	65.145(b)(1)(ii) and (b)(1)(iii), 65.164(b)(1) and 65.165(b)(5) and (b)(6)	Performance test in place of a design evaluation	BR	The CAR allows a performance test to be conducted as an alternative to performing a design evaluation. The CAR also has provisions for situations where a control device is shared between a storage vessel and another emission point and a performance test is required. A design evaluation is not required in this situation.
New	65.145(b)(2)	Exempt from design evaluation or performance test	BR	The CAR exempts several types of control devices from design evaluations or performance tests.
New	65.147(b)(1)	Must perform a flare compliance determination	C	The CAR specifically states that a flare compliance determination must be conducted. This is implicit in subpart Ka.
New	65.147(b)(2), 65.167(a)	Procedures when control devices are replaced	C	The CAR outlines the procedures to follow when one control device is replaced with another control device.
New	65.147(c)	Flare monitoring requirements	BI	Subpart Ka does not have specific flare monitoring requirements.
New	65.157(b)(1)	Prior performance tests acceptable	BR	The CAR allows prior performance tests and compliance determinations under certain situations.
New	65.157(b)(2) and (b)(3), and 65.164(b)(3)	Performance test and flare compliance determination waiver	BR	The CAR provides for waivers of performance tests and flare compliance determinations.
New	65.159 65.166(c)	R&R: Flare compliance determinations and monitoring	BI	Subpart Ka does not contain flare compliance determination and monitoring record requirements.
New	65.163(b)(1), (e), and 65.166(e)	Records of monitored parameters	BI	The CAR requires records of monitored parameters, while subpart Ka does not specifically require monitoring.
New	65.163(c) and 65.167(b)	Startup, shutdown, and malfunction plan and associated requirements	BR	<ul style="list-style-type: none"> - The CAR incorporates the startup, shutdown, and malfunction (SSM) plan from the part 63 General Provisions. These paragraphs are a necessary part of the SSM plan scheme. - The SSM plan acts to reduce burden because less reporting is required when there is a startup, shutdown, or malfunction. See the part 60 General Provisions correlation table for more discussion on the SSM requirements and the differences with the corresponding General Provisions of part 60.

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New	65.164(a)(1) and (a)(2)	Flare compliance determination notifications and reports	BI	The CAR requires the same type of report for the flare compliance determination as for the performance test. This includes a brief process description, descriptions of the sampling site and analysis procedures, record of operating conditions during the test, etc.
New	65.164(b)(2)	Submission of subsequent flare compliance determinations	C	The CAR specifies that a report for a performance test conducted after the Initial Compliance Status Report is due 60 days after completing the test.
New	65.165(b)(4)	Continuous records not required unless specified by monitoring plan	C	The CAR clarifies that continuous monitoring of control devices used on storage vessels (and therefore the continuous monitoring requirements) are not applicable unless specified by the monitoring plan.
New	65.166(a)	General information in a periodic report	C	The CAR adds clarity by specifying some general information that must be in a periodic report, including reporting dates and total source operating period.

^a**[Not Consolidated]** - Provisions that are not consolidated in the CAR because they are not relevant to SOCM sources or needed in the CAR.

^b**[Referencing Subpart]** - Provisions that are not consolidated in the CAR but remain in the Referencing Subpart and remain applicable to sources complying with the CAR.

^c Letters in this column indicate the following:

- C - clarification
- S - simplification
- BR - burden reduction
- BI - burden increase
- N - no significant change
- NC - not consolidated
- R - provisions retained in referencing subpart.